

August 12, 2020

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

RE: Joint letter seeking extension of time in *State of New York v. Wolf, et al.*, 20 Civ. 1127, and *Lewis-McCoy v. Wolf, et al.*, 20 Civ. 1142.

Dear Judge Furman,

Together, the parties respectfully write to request a two-week extension of the Court's deferral of action on Plaintiffs' unopposed cross-motion for summary judgment, ECF No. 96, from today, August 12, 2020, to August 26, 2020. The parties continue to engage in good-faith settlement negotiations, but do not anticipate reaching a final resolution today. Accordingly, the parties agree that they would benefit from a two-week extension of time. We thank the Court for its consideration of this request.

Respectfully submitted,

LETITIA JAMES
Attorney General of the State of New York

By: /s/ Daniela L. Nogueira
Daniela L. Nogueira, *Assistant Attorney General*
Matthew Colangelo, *Chief Counsel for Federal Initiatives*
Elena Goldstein, *Deputy Chief, Civil Rights Bureau*
Office of the New York State Attorney General
28 Liberty Street
New York, NY 10005
Phone: (212) 416-6544
daniela.nogueira@ag.ny.gov

Attorneys for Plaintiff in 20 Civ. 1127

NEW YORK CIVIL LIBERTIES UNION FOUNDATION

By: /s/ Antony P.F. Gemmell
Antony P.F. Gemmell
Molly K. Biklen
Jessica Perry
Jordan Laris Cohen
Christopher T. Dunn
125 Broad Street, 19th Floor

New York, NY 10004
212-607-3300
agemmell@nyclu.org

Attorneys for Plaintiffs and the Class in 20 Civ. 1142

AUDREY STRAUSS
Acting United States Attorney for the
Southern District of New York

By: /s/ Zachary Bannon
ZACHARY BANNON
ELIZABETH KIM
CHRISTOPHER CONNOLLY
Assistant United States Attorneys
86 Chambers St. 3rd Floor
New York, New York 10007
Tel.: 212-637-2728, 2745, 2761
Fax: 212-637-2717
E-mail: Zachary.Bannon@usdoj.gov
Elizabeth.Kim@usdoj.gov
Christopher.Connolly@usdoj.gov

Attorneys for the Defendants